

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET NO. N2012-1

**RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS
MAX HEATH TO INTERROGATORIES OF UNITED STATES POSTAL
SERVICE, USPS/NNA T-1 13-21
(June 6, 2012)**

The National Newspaper Association Witness Max Heath (NNA-T-1)
hereby submits his responses to the interrogatories of the United States Postal
Service, USPS/NNA T1-13 through 21.

Respectfully submitted,

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June 6, 2012

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USPS/NNA-T1-13. Please refer to your testimony on page 4, lines 14 through 25. You state,

NNA's findings are corroborated by the prestigious Pew Research Center, which completed a study in 2011 on where people get their local news. Pew broke information users into two categories: those over 40 and those under 40. Those over 40 got the following information from their local newspapers: politics, crime, art/cultural events, local business, schools, community events, restaurants, taxes, local real estate, government activities, housing, zoning/development, jobs and social services. Those under 40, generations widely thought not to read newspapers, nonetheless continue to count on them for this news: crime, arts/cultural events, community events, taxes, local government, jobs, social services and zoning/development. *"How People Learn about Their Local Community,"* September 24 2011, published by the Pew Research Center at www.pewinternet.org.

(A) Please confirm that the Pew report found that "Most Americans (69%) say that if their local newspaper no longer existed, it would *not* have a major impact on their ability to keep up with information and news about their community." (See page 1 of the Pew report.) (Emphasis in the original.)

(B) Please confirm that the Pew report found that "the data in a new national survey show that the majority (64%) of American adults use at least three different types of media every week to get news and information about their local community—and 15% rely on at least six different kinds of media weekly." (See page 3 of the Pew report.)

(C) Please confirm that the Pew report found that local TV news, word of mouth, and radio were used by adults more frequently than local newspapers for obtaining local news and information. (See page 13 of the Pew report.)

(D) Please confirm that the term "local newspaper" as used the Pew report includes the print version of a newspaper and a local newspaper website.

RESPONSES:

(A) Confirmed, but reading to the next paragraph and continuing onto the section on newspapers at

http://www.journalism.org/analysis_report/role_newspapers

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USPS/NNA-T1-13 (con't)

the study concludes that the initial impression about reliance on newspapers is a superficial finding and that further examination indicates that Americans do in fact rely heavily upon newspapers and that critical types of local information come from their newspaper reading.

(B) Confirmed. People do, of course, use many types of media. But it would be a superficial conclusion to draw from that finding the inference that the media are interchangeable. Some types of important information are found only in any depth in the local newspaper. Note, for example, this finding in the same section on the role of newspapers, focusing on tax information:

"For instance, 48% of those who get information about taxes turn to newspapers, more than double the percentage who turn to the next most popular platforms, the internet (20%) and TV news (19%). But when translated as a percentage of all citizens, just 22% of Americans rely on newspapers for tax information. Thus, while newspapers command this subject area, most people simply do not seek out information about the subject of local taxes.

The typical half-hour local TV newscast is closer to 15. So it is logical that newspapers would offer coverage of more topics in a community, while television might concentrate on a more limited number that attract the widest audience. Indeed, as PEJ found in a 2006 study, "In local metro dailies, citizens were far more likely to learn about things like taxes, education, zoning commissions and the activities of government than they would in most other media."

From these observations, I would conclude that people who care about taxes, for instance, rely heavily upon the newspapers. See Figure 6 at this link to see how people use newspapers to find serious in

formation. http://www.journalism.org/analysis_report/role_newspapers

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(C) For some types of information, confirmed. Even I, a devoted newspaper reader, look at the Weather Channel or local TV stations if I want to know whether a tornado is coming through.

(D) I agree that the study seems to have captured data on both newspapers in print and newspapers delivered via websites. However, I noted comment below as well on p. 1, so I believe the research gathered information primarily about printed newspapers.

Newspapers (both the print and online versions, though primarily print) rank first or tie for first as the source people rely on most for 11 of the 16 different kinds of local information asked about—more topics than any other media source. <http://www.journalism.org/node/26729>

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USPS/NNA-T1-14. Please refer to your testimony on page 9, lines 5 through 6, where you state, "Now we face the proposal to end overnight mail delivery for First-Class and Periodicals. It should be no surprise to the Postal Service or the Commission that community newspapers are vigorously pushing back against this proposal. We believe it spells the end of newspapers in the mail, along with the profitable Enhanced Carrier Route shoppers and Total Market Coverage publications that we mail." Please provide the following:

(A) The number of "Enhanced Carrier Route shoppers" that are NNA members and the percentage of such "shoppers" among NNA's membership.

(B) The number of "Total Market Coverage publications" that are NNA members and the percentage of such publications among NNA's membership.

RESPONSES:

(A) I do not know. I am unaware of any database, outside of data available on a proprietary basis to USPS only, that would list all Enhanced Carrier route shoppers, so I would have no basis for identifying the universe. However in my experience, weekly newspapers are most likely to have what I call "shoppers," that are delivered on a saturation basis to every household, while daily newspapers are more likely to deliver only to non-subscribers. This is because a shopper publication for a weekly newspaper provides them with an opportunity to have, essentially, an additional issue during the week, while for a daily, a shopper that was delivered to subscribers as well as non-subscribers would be duplicative. The newspapers I am most familiar with are those of Landmark Community Newspapers Inc. Of its 54 titles, about 80% have either a shopper or a TMC publication.

(B) I do not know. am unaware of any database, outside of data available on a proprietary basis to USPS only, that would list all Total Market Coverage publications, so I would have no basis for identifying the universe. I would call the non-subscriber publication discussed in (A) a Total Market Coverage publication. Dailies and multi-weekly newspapers are more likely to produce a

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USPS/NNA-T1-14 (con't)

non-subscriber shopper, though there are exceptions in specific markets based on advertiser demand for free vs. paid circulation.

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USPS/NNA-T1-15. Please refer to your testimony on page 11, lines 26 through 27. You state, “This optimization plan is being driven by the need to fill up letter-sorting machines with volume so greater automation efficiency will be achieved[.]” Please provide citations to the portions of Postal Service testimony that provide the basis for your statement that the Postal Service’s proposal is “is being driven by the need to fill up letter-sorting machines with volume.”

RESPONSE:

My understanding is that much of the proposal to slow down the mail is premised upon the need to use automated sorting equipment more efficiently. I considered the testimony of USPS T-4 Witness Neri, at p 13, lines 1-4-, p 17, lines 4-7, and lines 20 to the first line on the following page; p 21, lines 14-18; p 27, lines 2-6; p 28, lines 2-6; and the testimony of USPS T-3 Witness Rosenberg, at p 2, lines 3-8; p. 11, lines 28-31; the discussion in her testimony at p. 21-22 about modeling changes in peak volume handlings, and much of the rest of her testimony is about keeping the sorting machines running at optimal levels. Finally, the testimony of USPS T-1 Witness Williams is largely focused on the need to eliminate excess capacity, as he lays out on p 5, lines 14-22 why Rosenberg was directed to model ways to eliminate excess capacity. I am stating in simpler terms that slowing down the mail so machines--both for letter sorting and flat-sorting-- can run more often with higher volumes seems to me to provide a good part of the foundation of the Postal Service's case.

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USPS/NNA-T1-16. Please refer to your testimony on page 12, lines 16 through 21. You state, “[W]hat USPS must do is streamline its workforce, downsize the huge and inefficient--and aging--urban plants, maintain its smaller and more efficient plants and work with its labor groups to achieve more part-time and casual worker flexibility, cross-craft movement and buyouts for interested eligible employees. We all recognize that the benefit-rich environment of the 80s and 90s is no longer available for any American 20 work force. Newspapers faced that reality a decade or more ago.”

(A) Please explain whether the phrase “streamline its workforce” includes “work[ing] with...labor groups to achieve more part-time and casual worker flexibility, cross-craft movement and buyouts for interested eligible employees”? Does it include actions other than “work[ing] with...labor groups to achieve more part-time and casual worker flexibility, cross-craft movement and buyouts for interested eligible employees”? If yes, please identify those other actions.

(B) To what extent have you consulted with “labor groups” to determine the extent of their support for your suggested actions for “streamline[ing]” the Postal Service “workforce”? If such consultations have occurred, please summarize their results and provide copies of any written communications, other correspondence or understandings between NNA and such labor groups indicating such support.

(C) Please specifically identify the actions described in your response to part (A) that the Postal Service should undertake that the Postal Service is not currently considering.

(D) Please define the terms “efficient” and “inefficient” as you use those terms in your testimony.

(E) Please define the term “downsize” as you use it in your testimony. Please include in your definition whether the term downsize encompasses the consolidation of operations and/or the deactivation of mail processing plants.

(F) Please identify which specific plants in the Postal Service’s current network should be “downsized” because they are “huge and inefficient.”

(G) Please identify which specific plants in the Postal Service’s current network should be “maintained” because they are “[small] and more efficient.”

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RESPONSES:

(A) Yes. I am comparing the Postal Service to the newspaper industry, in this case, another area of the economy that has been affected both by recession and by secular changes due to technology. In the case of newspapers, fewer people are now required to do more jobs. Part-time, cross-craft workforce is necessary to be more efficient. Sometimes layoffs are needed to right-size the workforce. But the key to maintaining customer loyalty is to use the people and equipment that the revenue in the enterprise can support in the best way to make sure the right work is done in the right places. This type of right-sizing is often painful over the short term, but it ensures the best product and service and greatest sustainability in the enterprise, which in turn protects more people's jobs.

(B) I have consulted with no postal labor groups. Again, I am comparing the Postal Service to what I know of the newspaper industry's similar grappling with change, and I am somewhat familiar with the nature of discussion between management and labor in that context, although those negotiations have not been a part of my direct lines of responsibility. Again, they are painful adjustments, but necessary.

(C) I believe the Postal Service is making serious and possibly uncorrectable error, by trying to "streamline" its mail processing to aggregate mail in large urban plants where it has historically suffered its worst service problems. Instead, it should right-size and customize plants in the smaller communities that have historically had better service. A more dispersed mail processing network would avoid unnecessary hauling that slows the mail, keep operations closer to the customers being served and protect the Postal Service's mission to serve rural America. The plans being proposed are going to seriously disadvantage smaller communities where the Postal Service is more greatly intertwined with community and economic life, and instead focusing on more densely-populated

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USPS/NNA-T1-16 (con't)

areas that have the greatest number of choices for delivery, distribution and media usage.

(D) By "efficient," I mean the provision of prompt and reliable mail delivery. By "inefficient," I mean the slower, less reliable delivery that will surely result from the proposal in this case. In business, if the customer is not served, the industrial metrics that measure output are irrelevant in the long run.

(E) By downsize, I mean fitting facility size and workforce to the mail that logically would flow through it in a system that places highest value on customer need and not machine optimization. I am not recommending against closing mail processing facilities, per se, if mail flow suggests that they are in the wrong places, of the wrong design or otherwise extraneous to the flow of mail. My issue with the proposal in this case is that rather than downsize the facilities in the system, USPS is electing to seek maximum machine output by hauling mail further so it can run machines longer. That is not a business model--it is an industrial design.

(F) I am not picking on any specific plant. In general, however, I believe business mailers have long been familiar with problems in older plants where building design and transportation networks work against the managers who are seeking to provide timely service. I can say that my experiences with obtaining timely delivery in old multi-story plants like St. Louis, Cincinnati, Des Moines, and similar plants in congested urban areas have been negative, and plant managers and processing personnel have explained to me that these reasons hamper timely delivery. Problems get "fixed" only to recur within weeks or months.

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USPS/NNA-T1-16 (con't)

(G) I have done no nationwide study, but looking within my own areas in Kentucky with which I am familiar, I would be looking more closely at the plants in Lexington, Bowling Green, Owensboro, Somerset, and Elizabethtown, to name five, to see whether staffing adjustments could keep more mail closer to the cities within 3D ZIPs 403-406, 421-422, 423, 425-426, and 427, respectively--for processing instead of sending mail to Louisville, Knoxville, or Evansville.

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USPS/NNA-T1-17. Please refer to your testimony on page 13, lines 4 through 7. You state, "I deeply regret the financial circumstances that have led the Postal Service to propose ending overnight mail delivery for any mailer or community. This proposal has injected great uncertainty into the mailing community and inevitably--regardless of the outcome--has accelerated the move of mail out of the system forever."

(A) Please identify the matters, issues, or policies of which the "mailing community" is now uncertain due to the Postal Service's proposal in this docket?

(B) Please quantify the amount of mail that has moved out of the mail stream as a result of the announcement of the Postal Service's proposal in this docket.

RESPONSES:

(A) 1. Proposal to end Saturday mail delivery; 2. Proposal to eliminate overnight Periodicals and First-Class mail standards; 3. The Postal Service's ongoing network optimization that is resulting in plant closings, the moving of mail into plants that are not ready to handle new volumes and consequently slow the mail down. 4. Repeated announcements by the Postal Service that it is running out of money, followed by announcements that it really is not running out of money and will continue to deliver the mail. 5. Most recently in our industry, the Postal Service's decision to offer a Negotiated Service Agreement with Valassis, Inc., that is designed to eliminate advertising in newspapers. Taken together, the mosaic mailers see is one of confusion, uncertainty and undependability. By mailing community, I am referring not only to my own colleagues in the newspaper business that rely on the mail but many within the Mailers Technical Advisory Committee, where I have more than 20 years of service.

(B) I have no idea how a person would isolate this one circumstance to try to quantify the volume effects, even if NNA had the resources to attempt to do so. But I understand that the Postal Service's own market research performed in the fall of 2011 by Opinion Research Corporation (ORC) that initially suggested

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USPS/NNA-T1-17 (con't)

slowing down First-Class and periodical mail would cause First-Class to drop by over 10% and periodical mail by nearly 20%. That research would provide a good place to begin examining the risks in this case. Independently, I have had contacts from a statewide group of publishers within the Iowa Newspaper Association asking my advice in setting up alternate delivery for newspapers in the mail, and also from Oklahoma Press Association asking for the same advice. Other newspapers individually have posed the same question to me. The net negative impression given by all events of the past 2-3 years sends the message that USPS will not be a reliable delivery partner in the future.

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USPS/NNA-T1-18. Please refer to your testimony on page 14, lines 7 through 9. You state, "Where flats are concerned, in particular, I believe from personal conversations with postal personnel and my own observation that gaining plants will be unable to handle effectively a large surge in volume."

(A) With respect to the "postal personnel" referenced in your testimony, please state, for each person:

- (i) his or her name,
- (ii) his or her location (city and 5-digit ZIP Code) of employment,
- (ii) the gaining plant or plants that was/were the subject of your communication, and
- (iv) the date or date range of your communications with that person concerning the subject of the ability of gaining plants to handle additional mail volumes.

(B) With respect to any gaining plants that you observed, please state :

- (i) the location (city and 5-digit ZIP Code) of the gaining plant; and
- (ii) details of your observations that led you to conclude that such plant would be "unable to handle effectively a large surge in volume."

RESPONSES:

(A) I do not maintain records based on individual conversations and except in egregious circumstances, I do not wish to hold up any postal worker or executive for criticism. For the most part I find they are purposeful and well-meaning individuals trying to do their best in difficult situations.

(B) Again, I have conducted no systematic studies of the gaining plants, but I have noted from the complaints I get from NNA publishers that the AMP process is almost uniformly disruptive and that gaining plants are not ready for the volume they receive, nor able to adjust except over long periods of time, if at all. Since some of the volume will have been driven out of the mail by poor service during these adjustment periods, it is impossible to tell whether they eventually adjust to the changes or simply have less mail to handle. To cite two I have been intimately involved with, the gaining plant in Baltimore has stood out as unable to handle the volumes, and the several changes in southwest Virginia and eastern

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USPS/NNA-T1-18 (con't)

Tennessee that involved plants in Bristol, TN and Knoxville, TN, have generated numerous problems for newspapers.

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USPS/NNA-T1-19. Please refer to your testimony on page 8, line 15. You state, "The new 'droop' test...disqualifies many for automation discounts."

(A) Please confirm that this portion of your testimony is referring to section 301.1.6 of Mailing Standards of the United States, Domestic Mail Manual (DMM) (May 7, 2012) titled "Maximum Deflection for Flat-Size Mailpieces."

If you do not confirm, please identify the postal rule, regulation, standard, or policy to which you are referring in this portion of your testimony. If your testimony is based on a rule, regulation, standard, or policy other than DMM § 301.1.6, please identify each rule, regulation, standard, or policy.

(B) What is your understanding of the purpose of the droop test?

(C) Please provide the percentage of community newspapers that are processed on automation equipment.

(D) Please provide the number, percentage, and aggregate circulation of newspapers that have been disqualified as a result of the droop test.

Please provide all documents or other sources that provide the basis for your response.

RESPONSES:

(A) Confirmed.

(B) For automated mail, I understand the purpose is to penalize mail that does not most efficiently move through machines. For non-automated mail, I have no idea of the purpose, and I was surprised the Postal Service decided to extend the test to any manually-handled mail. I was pleased that it ultimately decided not to use the test on DU-entered, manually handled Carrier Route mail, which never needs to be sorted by machine.

(C) As the Postal Service should well know by now, NNA does not carry out studies to quantify mail use practices by newspapers. NNA lacks the resources to create and provide this type of quantifiable data. But I have had calls and e-mails from dozens of newspapers in the past couple of years about this problem, and I am aware that many are now paying higher postage for having mail too thin or too flimsy to allegedly move efficiently through machines, even if the mail would not have moved through machines even if the mailpiece was thick enough to pass the droop test. I am regarding this upcharge as an attempt by the Postal Service to raise revenue without addressing the rate cap.

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USPS/NNA-T1-20. Please refer to your testimony on page 9, lines 15 through 26. You state,

I was personally involved in the study conducted by IBM that was reported to the Commission as the Community Newspapers Study Highlights, 2010. I participated in the introductory meetings with IBM and USPS Consumer Affairs and Business Mail Entry specialists, and assisted in selecting lists of newspapers for IBM to use for “salting” recipients to test delivery times. Although I did not keep notes from those sessions, I remember well that despite the highly professional and rigorous conduct of IBM’s personnel, they found that for many of the NNA newspapers they could not find monitors to receive mailed newspapers. We learned the IBM’s mail monitoring people are in larger cities and suburbs and that it does not have many in small towns. So the newspapers selected to participate skewed toward our own suburban members. A truer picture of small town and rural America delivery would have been developed if there were more widely dispersed monitors.

- (A) Please define the term “salting” as you understand it.
- (B) Please confirm that there was only one instance in which an NNA publisher agreed to participate in the study but IBM did not have sufficient “within-county” monitors to receive that publisher’s newspapers. If you do not confirm, please provide the number of NNA newspapers that participated in the study for which IBM’s personnel “could not find monitors to receive mailed newspapers” and provide all information or documents that you reviewed and that supports your response.
- (C) Please clarify how you came to understand that “IBM’s mail monitoring people are in larger cities and suburbs and that it does not have many in small towns.”
- (D) Please state your understanding of how IBM monitors are distributed across the country and provide all information or documents that you reviewed and that supports your understanding.

RESPONSES:

(A) Salting is the inserting of names and addresses into a mailing list of individuals that would not ordinarily be part of that mailing but which are designed to direct delivery of a mailpiece to those individuals and households for specific purposes, such as to test delivery times.

(B) I cannot confirm. I have not kept notes from that study. But I recall that both NNA and IBM had some difficulty in making sure rural newspapers were sufficiently represented in the study. I don’t believe there is any testimony in this

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USPS/NNA-T1-20 (con't)

case that indicates only one instance occurred where a monitor could not be found. I simply recall that we had some trouble identifying newspapers that published in areas where monitors were situated. The experience with the NNA test caused me to wonder how well rural America is represented in the other mail studies using mail monitors. It may be that the problem stems from USPS's definition of "rural." I note in some previous docket, communities that I would consider more suburban, like Snohomish County, WA, and Gwinnett County, GA, have been identified by USPS as rural.

(C) Again, I have not kept my notes from the study, but in meetings during the design phase of the study, I can recall having conversations to this effect.

(D) Besides having heard many reports on EXFC scores from IBM service monitoring during my years at MTAC, my understanding of the IBM monitoring process is limited to my experience with this study. I would like to clarify that my comments are not intended as a reflection upon IBM, which carried out the best study it was able to do, and conducted its collaboration with NNA in a highly-professional manner.

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USPS/NNA-T1-21. Please refer to your testimony on page 10, lines 16 through 23. You state,

[A]lthough the study was intensive and time-consuming for NNA as well as the Postal Service, it was better than what we have now. The Postal Service announced in its 2010 filing that it intended to use magazine service scores as a proxy for newspapers. NNA did not object. In fact, we were surprised to learn of the filing, as it appeared in a docket that NNA did not participate in. We had expected after NNA's considerable expense for the survey we would have had the courtesy of at least an alert from the Postal Service when the report was released, but good etiquette failed in that case, I believe, amidst USPS's many staff restructurings at headquarters.

Please also refer to the Community Newspaper Study Highlights filed with the Commission on July 9, 2012 (available at <http://www.prc.gov/Docs/68/68891/Notice%20Newspaper%20Study.pdf>).

(A) Please confirm that representatives from IBM and the Postal Service presented the survey results to NNA on May 18, 2010, at Postal Service headquarters in Washington, D.C.

(B) Please confirm that the study found that the Community Newspapers' national result of 72.48 percent (on-time performance) was comparable to the periodicals result of 75.44 percent for the same period.

(C) Please confirm that the study found that the on-time percentage results for Community Newspapers and Periodicals were similar enough that Periodicals could be considered a proxy for Community Newspapers Mail.

(D) Please confirm that the study found that it would be difficult for newspaper mailers to participate in ongoing measurement and that ongoing costs for subscriptions and conducting the study may outweigh its value.

RESPONSES:

(A) Confirmed. I was told at the time the results were embargoed and that NNA could not publicly discuss them until notified. We never had any further notification after that.

(B) Confirmed. Those are not very good scores for time-sensitive mail. We were disappointed.

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(C) Confirmed that it was the Postal Service's conclusion. As to NNA's conclusion, participation is indeed difficult. Community newspapers have small staffs and are increasingly time challenged. But as to the value of such a study, at this point, I am uncertain. Although NNA prior to the study had advised both USPS and the Commission that it felt spending money on such a study was unnecessary because we felt we had a good handle on most Within County mail performance, the massive changes within USPS since that time have caused NNA to be much more concerned about service. Whether such a study would be justified in the future is a subject upon which I have not yet drawn a conclusion, but I am certainly less sanguine about the lack of need for it than I was in 2009.